

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

IN RE:

BK RACING, LLC

Debtor.

CASE NO. 18-30241

CHAPTER 11

**NOTICE OF APPEARANCE AND REQUEST
FOR NOTICES AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned appears as counsel in the above-referenced bankruptcy case for Union Bank & Trust pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Rules”) and hereby gives notice of such appearance.

TAKE FURTHER NOTICE that the undersigned, pursuant to Rules 2002(g) and 9007, hereby requests that all notices given or required to be given, and all papers served or required to be served, in this case be given to and served upon the undersigned at the address indicated below.

TAKE FURTHER NOTICE that the foregoing request includes not only notices and papers referred to in the Rules, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, or demand, made by the debtor or any party in interest in this case.

TAKE FURTHER NOTICE that Union Bank & Trust does not intend for this Notice of Appearance or any subsequent appearance, pleading, claim or suit, to waive, and Union Bank & Trust expressly reserves its (i) right to have final orders in noncore matters entered only after de novo review or trial by a District Court, (ii) right to trial by jury in any proceeding or trial so triable herein or in any case, controversy, or proceeding relating hereto, (iii) right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal, or (iv) rights, claims, actions, defenses, setoffs or recoupments to which Creditor is or may be entitled to under agreements, in law, in equity, or otherwise. This Notice of Appearance is not, and shall not be construed to be, a consent by Union Bank & Trust pursuant to 28 U.S.C. § 157(c)(2).

This 16th day of February, 2018.

/s/ David M. Schilli

David M. Schilli

N.C. State Bar No. 17989

Attorneys for Union Bank & Trust

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following parties:

James H. Henderson, Esq.
The Henderson Law Firm
1201 Harding Place
Charlotte, North Carolina 28204

U.S. Bankruptcy Administrator Office
402 W. Trade Street
Suite 200
Charlotte, NC 28202-1669

Dated: February 16, 2018.

s/David M. Schilli

David M. Schilli